

IN RE:	§	
ROBERT L. ELLIS	§	CASE NO. 10-82128
	§	
DEBTOR	§	CHAPTER 13
<hr/>		
AMERICAN GENERAL FINANCIAL	§	
SERVICES	§	
	§	
Movant	§	
	§	
vs.	§	
	§	
ROBERT L. ELLIS	§	
BEVERLY H. ELLIS	§	
	§	
Respondent(s)	§	
	§	

NOW COMES AMERICAN GENERAL FINANCIAL SERVICES (“Creditor”), by and through its undersigned attorneys, and responds to the Trustee’s Proposed Order Confirming Chapter 13 Plan as follows:

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5. Creditor asserts that the real estate has sufficient value to secure the remaining balance owed, based upon the recent county tax valuation, and hereby requests a hearing and authority to enter the premises to perform an appraisal.

WHEREFORE, Creditor requests the following:

1. That a hearing be held in this cause;
2. That the court adjust the collateral's value
3. For any other and further relief this court deems just and proper.

Dated this 28th day of February, 2011.

Respectfully submitted,

/s/ John C. Bircher III

John C Bircher, III

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